

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 15-cr-20040

v.

HON. JUDITH LEVY

TASHUN WHITE,

Defendant.

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**GOVERNMENT'S WRITTEN SUMMARY OF OPINION WITNESS  
TESTIMONY PROVIDED PURSUANT TO RULE 16(a)(1)(G)  
AND FEDERAL RULES OF EVIDENCE 701 AND 702**

The United States of America, through its undersigned counsel, states  
as follows:

1. This summary is provided to Defendant TASHUN WHITE pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Federal Rules of Evidence 701 and 702.
2. The following individual(s) may be called as a witness by the government in its case in chief and may provide opinion testimony within the scope of Rules 701, 702, 703 or 705 of the Federal Rules of Evidence:

(A) Witness: Frank Scartozzi  
Financial Investigations Analyst  
U.S. Attorney's Office.  
211 W. Fort St.  
Detroit, MI 48226

Summary of Testimony: Mr. Scartozzi is expected to testify generally about the review and analysis of documents obtained from banks, credit unions, other financial institutions, and related regulatory agencies, as well as certified financial documents obtained pursuant to subpoena such as those at issue in the present case. He is expected to testify more specifically about his personal examination of records obtained from financial institutions during the investigation in this case, including bank and credit union receipts, account statements, and similar documents reflecting deposits, withdrawals, debit activity, and teller provided services, along with corresponding documentation for this and similar financial activity, such as cancelled checks, deposit tickets and paycheck stubs.

Basis for Testimony: Mr. Scartozzi's testimony will be based upon his training, education and experience in the field of financial investigation and analysis, and his examination and familiarity with the financial-related documents in this case.

Qualifications: Mr. Scartozzi has worked in the field of financial investigation and analysis for roughly 40 years. He was employed by the criminal investigation division of the Internal Revenue Service as a special agent for 30 years, and thereafter worked at the Bureau of Alcohol, Tobacco and Firearms for three and a half years as a financial analyst and investigator. Since 2011 he has worked as a contractor with the U.S. Attorney's Office handling financial investigations.

Having provided the information set forth above, the United States requests pursuant to Rule 16(a)(2)(C), that it be provided a reciprocal summary of expert/opinion witnesses, if any are expected to be called by the defendant.

Respectfully submitted,

BARBARA L. McQUADE  
United States Attorney

s/ Carl D. Gilmer-Hill  
CARL D. GILMER-HILL (CA161939)  
Assistant United States Attorney  
211 W. Fort, Ste. 2001  
Detroit, MI 48226  
(313) 226-9585

Dated: November 30, 2016